

File

June 3, 1985

TO: Coal File, Inspection and Enforcement Folder
FROM: David Lof, Mining Field Specialist *DL*
RE: Genwal Coal Company, Crandall Canyon Mine, ACT/015/032,
Folder #7, Emery County, Utah

On May 8, 1985, I conducted a partial inspection at the above mentioned mine site. Most of the mine area and areas surrounding the mine was dry. However, there was still some snow high on the north facing slopes.

Spring and Seep Inventory, NOV N85-4-7-2, #1 of 2

This violation was issued on March 14, 1985 for the operators failure to comply with Stipulation 817.52 Groundwater-(2)-DWH. The remedial action required that the operator respond to an August 17, 1984 letter from the Division requesting additional spring and seep inventory information by June 12, 1985.

Crandall Canyon Road, NOV N85-4-7-2, #2 of 2

This violation was issued on March 14, 1985 for the operators failure to construct and maintain the road within the permit area in accordance with the approved permit and design standards. The operator must bring the roads up to design specifications by May 13, 1985.

It did not appear as though the operator had done any work on the road since my April 30, 1985 inspection. During a meeting I had with Andy King of Genwal Coal Company on May 10, 1985 we discussed the remedial actions required for abatement of the violation. Mr. King said that they did not want to have to put down the 8 inch gravel base on the road as required in the design specifications at this time because the realignment work which is going to take place in response to NOV N85-4-5-2, #2 of 2. I told him that I understood and that there would not be a problem with extending the abatement deadline for applying the gravel base. But that they should have the sub base properly graded and the culverts cleaned out by May 13, 1985.

Mine Operation Facilities, NOV N85-4-5-2, #2 of 2

This violation was issued on February 2, 1985 for the operators failure to locate and construct their mine operation facilities in accordance with their approved permanent permit. The operator is required to submit plans for the relocation of the facilities and reclamation of the present facilities location on May 23, 1985.

Portal Pad Runoff, NOV N85-4-12-3, #1 of 3

This violation was issued on April 9, 1985 for the operators failure to mine in accordance with their approved mine plan and failure to pass all surface drainage from the portal pad area east of the conveyor through the sediment pond. The operator was

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required to extend a temporary downspout from the existing culvert to convey runoff from the pad in a controlled manner to the inlet of the cross culvert to the sediment pond immediately. In addition, they are required to submit plans to the Division by May 23, 1985 detailing how the runoff from the east end of the portal pad will be conveyed to the sediment pond in a controlled manner.

Upper Topsoil Stockpile, NOV N85-4-12-3, #2 of 3

This violation was issued on April 9, 1985 for the operator's failure to adequately protect the upper topsoil stockpile. The operator was required to reconstruct the strawbale dike around the topsoil stockpile by April 18, 1985.

During my April 30, 1985 inspection I found that the operator had replaced some strawbales around the stockpile, however the protection was still inadequate. I discussed this with Mr. King during a telephone conversation on May 6, 1985, at that time he committed to installing more strawbales immediately.

At the time of this inspection I found that there had not been any additional work done to protect the topsoil stockpile. The operator was obviously having a difficult time properly installing strawbales to provide protection for the topsoil stockpile. I modified the violation on May 10, 1985 as follows:

Remedial Action Required

Install a durable fence around the base of the upper topsoil stockpile and place loose straw at least 12 to 18 inches deep along the inside of the fence.

Abatement Deadline

May 21, 1985.

Noncoal Waste, NOV N85-4-12-3, #3 of 3

This violation was issued on April 9, 1985 for the operators failure to properly store and control noncoal waste materials within their permit area. The operator was required to: Remove all soil materials contaminated by oil and gas by July 9, 1985; pick up and dispose of all garbage, old timbers metal and other noncoal waste by April 25, 1985; submit complete plans to the Division for storage of all materials in a controlled manner by May 23, 1985; and place oil and gas absorbing material around and under the generator and oil/gas storage areas to absorb all oil and gas spills by May 8 1985.

At the time of this inspection I found that the operator had picked up and disposed of almost all of the noncoal waste materials in the

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mine site. They had also spread sawdust around the oil/gas storage area to absorb spilled oil and gas. However, the amount they had used was not adequate to cover the entire area where oil and gas had been spilled previously to a sufficient depth to control any future oil and gas spills. When I was at the mine office following my field inspection I told Wanda Gent of Genwal Coal Company, that the operator needed to spread the sawdust over the area to a depth of at least two inches. This was also discussed with Andy King during our May 10, 1985 meeting at which time he committed to having more sawdust spread in the area.

Sediment Pond

The pond was discharging through the one inch perforation in the principle spillway at less than one gallon per minute. There were no apparent effluent limitation violations. The operator had removed all of the scrap pipe from the sediment pond embankment as I had requested during my May 6, 1985 telephone conversation with Mr. King.

Fugitive Dust

I noticed that the coal haulage trucks coming up to the mine site had extremely large dust plumes. And the loaded trucks leaving the mine site had almost no dust plumes (probably due to their reduced speed.) When I was in the operators mine office later that day, I told Ms. Gent that the operator needed to have the road watered in order to control the dust. I recommended that they water the road at least twice a day on days during which they received no precipitation, or more if necessary. Also during my May 10, 1985 meeting with Andy King, I informed him of the need to adequately control the dust on the road and within the mine operations area itself in accordance with their approved plan.

Ten Day Notice, X-85-02-113-05

On April 30, 1985, the Division received the above mentioned Ten-Day Notice (TDN). The TDN was issued for the operators failure to have records available at the time of the OSM inspectors inspection. The records not available were; the as-built sediment pond certification and surface blasting reports. At the time of this inspection, the records in question were available.

Undisturbed Diversion, NOV N85-4-16-1

I inspected the entire length of the undisturbed diversion and found that it was wholly inadequate. In many areas the diversion did not meet design specifications and in several areas it was virtually

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nonexistent. There does not appear to have been any damage caused to the mine site, due to the lack of the diversion, however, if a large precipitation event occurred the additional runoff which would go to the sediment pond could cause a great deal of damage. Because of this Notice of Violation N85-4-16-1 was issued on May 10, 1985, it reads as follows:

Nature of the Violation

Failure to mine in accordance with an approved mine plan.
Failure to construct and maintain a diversion to prevent runoff from a sediment pond to insure that it will pass safely the peak runoff from a ten-year, 24 hour precipitation event.

Provisions of the Regulations, Act or Permit Violated

UCA 40-10-22(1)(c)
UMC 771.19
UMC 817.43 (a)

Portion of the Operation to Which Notice Applies

The entire undisturbed diversion above the disturbed area

Remedial Action Required

- A. Construct the diversion so that it meets the approved designed specifications.
- B. Submit complete and adequate plans to the Division to modify the present design to control the undisturbed runoff.

Time for Abatement

June 4, 1985

re

cc: Charles Gent, Genwal Coal Company
Bill Boley, Manti La-Sal National Forest
Donna Griffin, OSM
Joe Helfrich, DOGM
John Whitehead, DOGM

Statistics: See Co-Op Mining Company, Bear Canyon Mine memo dated
May 27, 1985

0243Q-25-28